UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

ALVA JOHNSON, Individually and on behalf of all others similarly situated,

Case No. 8:19-cv-475-T-02SPF

Plaintiff,

VS.

DONALD J. TRUMP, In his Individual Capacity and DONALD J. TRUMP FOR PRESIDENT, INC.,

Defendants.	

MOTION FOR PERMISSION FOR JENNIFER BENNETT TO APPEAR PRO HAC VICE

Janet R. Varnell of the law firm of Varnell & Warwick, P.A., as counsel for Plaintiff, Alva Johnson, on behalf of herself and all others similarly situated ("Plaintiff"), hereby respectfully requests that this Court enter an Order permitting Jennifer Bennett to appear *pro hac vice* as cocounsel for Plaintiff in this action. In support of this Motion, the undersigned states as follows:

- 1. This application is made pursuant to Local Rule 2.02 of this Court.
- 2. Jennifer Bennett is a member in good standing of the bar of the State of California. Ms. Bennett is in good standing and licensed to practice in the United States District Court for the Central District of California. There are no pending disciplinary proceedings against Ms. Bennett in any state or federal court. Ms. Bennett has never been convicted of a felony. Ms. Bennett has never been censured, suspended, disbarred, or denied admission or readmission by any court.

- 3. Ms. Bennett is not a resident of Florida and does not make frequent or regular appearances in separate cases to such a degree to constitute the maintenance of a regular practice of law in the State of Florida.
- 4. Ms. Bennett's office address is Public Justice, P.C., 475 14th Street, Suite 610, Oakland, CA 94612; telephone: (510) 622-8150; e-mail: jbennett@publicjustice.net.
- 5. Ms. Bennett is familiar with the Rules of this Court, including Rule 2.04, and is familiar with, and will be governed by, the Code of Professional Responsibility and other ethical limitations or requirements governing the professional behavior of members of the Florida bar.
- 6. In accordance with the local rules of this Court, Ms. Bennett's completed Special Admission Attorney Certificate form has been forwarded to the Clerk of the Court. It is further certified that Ms. Bennett has complied with the fee and e-mail registration requirements as required by Local Rule 2.01(d).
- 7. Ms. Bennett, by and through designated counsel and pursuant to Rule 2.02 of the CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to jbennett@publicjustice.net.
- 8. Ms. Bennett is associated with local counsel, Janet R. Varnell, of the law firm of Varnell & Warwick, P.A. Ms. Varnell is a resident of Florida and maintains an office in this District for the practice of law. She is a member in good standing of the Florida Bar and is an active member to the bar of this Court. She is the person with whom the Court and opposing counsel may readily communicate, upon whom all notices and papers may be served, and who will be responsible for the progress of the case, including the trial in default of the non-resident attorney, Ms. Bennett.

Rule 3.01(g) Certification

Counsel for Defendants have not entered an appearance and pursuant to Local Rule 3.01(g), the undersigned is unable to confer with opposing counsel to determine if they have any objection to the relief sought in this motion.

WHEREFORE, the undersigned respectfully requests that this Court enter an Order permitting Ms. Bennett to practice before this Court for the limited purposes of representing Plaintiff in this action.

Dated: March 5, 2019 VARNELL & WARWICK, P.A.

By: /s/ Janet R. Varnell

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 5, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Janet R. Varnell
Janet R. Varnell

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

ALVA JOHNSON, Individually and on behalf of all others similarly situated,

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Plaintiff,

Defendants.

<u>Copies furnished to:</u> All counsel of record

VS.

DONALD J. TRUMP, In his Individual Capacity and DONALD J. TRUMP FOR PRESIDENT, INC.,

ORDER ON MOTION FOR ADMISSION TO APPEAR PRO HAC VICE
THIS CAUSE came before the Court upon Janet R. Varnell's Motion under Local Rule
2.02 asking the Court to allow Jennifer Bennett for Admission to Appear Pro Hac Vice on behalf
of Plaintiff in this case. Having considered the motion and all other papers submitted and the
records and files herein, and having determined that all conditions to admission as counsel pro hac
vice have been satisfied, it is
ORDERED AND ADJUDGED that the Motion for Admission for Jennifer Bennett to
Appear <i>Pro Hac Vice</i> is GRANTED.
DONE AND ORDERED in Orlando, Florida, this day of, 2019.
Sean P. Flynn
United States District Judge